

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

APR -1 2015

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. S1 – 4:14 CR 00366 HEA (TCM)

OLAJUWON DAVIS,

a/k/a “Ali,”

a/k/a “Brother Ali,”

a/k/a “Olajuwon Akeem Ozreal

Raheem Lamar Xavier Ali,” and

BRANDON ORLANDO BALDWIN,

a/k/a “Brandon Muhammad,” and

a/k/a “Brother Brandon,”

Defendants.

**SUPERSEDING INDICTMENT**

**COUNT I**

The Grand Jury charges that:

A. **INTRODUCTION**

At all times pertinent to the charge in Count I of this indictment:

Federal law defined the term “explosive” to include “gunpowder, powders used for blasting, all forms of high explosives, blasting materials, fuses (other than electric circuit breakers), detonators, and other detonating agents, smokeless powders, other explosive or incendiary devices ...” Title 18, United States Code, Section 844(j).

B. **THE CONSPIRACY**

Beginning at a time unknown, but including September 2014 through on or about November 21, 2014, with the exact dates unknown to this Grand Jury, in the Eastern District of

Missouri and elsewhere,

**OLAJUWON DAVIS,**  
a/k/a "Ali,"  
a/k/a "Brother Ali,"  
a/k/a "Olajuwon Akeem Ozreal  
Raheem Lamar Xavier Ali," and  
**BRANDON ORLANDO BALDWIN,**  
a/k/a "Brandon Muhammad,"  
a/k/a "Brother Brandon,"

the defendants herein, knowingly and intentionally conspired, combined, confederated and agreed to maliciously damage and destroy, by means of an explosive, a building, vehicle and other property used in an activity affecting interstate commerce.

C. OVERT ACTS

In furtherance of said conspiracy and to affect the objects thereof, overt acts were committed in the Eastern District of Missouri and elsewhere, including, but not limited to, the following:

1. On or about November 5, 2014, BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," stated that he wanted to build bombs and see them blow up.
2. On or about November 8, 2014, BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," stated that he wanted multiple bombs to use against people, buildings, vehicles and property.
3. On or about November 12, 2014, BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," viewed a recording of what appeared to be the detonation of a high explosive or bomb, and said "we need em, we need em."
4. On or about November 12, 2014, OLAJUWON DAVIS, a/k/a "Ali," a/k/a "Brother

Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” viewed a recording of what appeared to be the detonation of a high explosive or bomb, and said he was interested and discussed targets for the high explosive or bomb, with BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon.”

5. On or about November 17, 2014, OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” stated that he wanted a high explosive or bomb to “test it out” and said that the purchase of the high explosive or bomb was “definitely a go” and wanted it by Friday (November 21, 2014).

6. On or about November 18, 2014, OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” paid a deposit for an item he believed was a high explosive or bomb, and stated, “I need it ASAP brother, I need that motherfucker ASAP.”

7. On or about November 18, 2014, OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” agreed to purchase items he believed were three high explosives or bombs.

8. On or about November 20, 2014, and continuing into early November 21, 2014, OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” and BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” traveled to a location where OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” took possession of items he believed were three high explosives or bombs.

In violation of Title 18, United States Code, Sections 844(i) and 844(n).



**COUNT II**

The Grand Jury further charges that:

A. **INTRODUCTION**

At all times pertinent to the charges in this indictment:

OLAJUWON DAVIS, a/k/a "Ali," a/k/a "Brother Ali," a/k/a "Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali," and BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," were not federally licensed and permitted importers, manufacturers, dealers, and collectors of firearms.

B. **THE CONSPIRACY**

1. Beginning at a time unknown, but including September 2014 through on or about November 21, 2014, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri and elsewhere,

**OLAJUWON DAVIS,**  
a/k/a "Ali,"  
a/k/a "Brother Ali,"  
a/k/a "Olajuwon Akeem Ozreal Raheem  
Lamar Xavier Ali," and  
**BRANDON ORLANDO BALDWIN,**  
a/k/a "Brandon Muhammad,"  
a/k/a "Brother Brandon,"

the defendants herein, did knowingly and willfully conspire, combine, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to commit offenses against the United States, to wit:

(1) to knowingly make false and fictitious written statements to a licensed dealer, Cabela's Retail – Hazelwood, Missouri, which statements were intended and likely to deceive said licensed dealer with respect to a fact material to the lawfulness of the sale of said firearms under Chapter 44

of Title 18, of the United States Code, in that Brandon Orlando, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” represented that he was the actual buyer of said firearms when in fact Brandon Orlando Baldwin, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” was acquiring said firearms on behalf of other persons in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2); and

(2) to transfer firearms, knowing and having reasonable cause to believe that the person or persons receiving the firearms had been convicted of a crime punishable by imprisonment for a term exceeding one year (a felony), in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

C. MANNER AND MEANS OF THE CONSPIRACY

The defendants and co-conspirators accomplished, and attempted to accomplish, the objects of the conspiracy in the following manner and through the following means:

1. It was part of the conspiracy that the defendants and co-conspirators OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” and BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” engaged in the conspiracy for the purpose of illegally obtaining monies and other things of value for illegally obtaining the firearms.

2. It was part of the conspiracy that the defendants and co-conspirators OLAJUWON DAVIS, a/k/a “Ali,” a/k/a “Brother Ali,” a/k/a “Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali,” and BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” engaged in the conspiracy to purchase, obtain, and attempt to purchase and obtain firearms for other persons.

3. It was further part of the conspiracy that defendant BRANDON ORLANDO

BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," after obtaining firearms, illegally transferred said firearms to other persons, including but not limited to persons previously convicted of felony crimes.

D. OVERT ACTS

In furtherance of said conspiracy and to affect the objects thereof, overt acts were committed in the Eastern District of Missouri and elsewhere, including, but not limited to, the following:

1. In or about October 2014, defendant OLAJUWON DAVIS, a/k/a "Ali," a/k/a "Brother Ali," a/k/a "Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali," arranged for another person to meet BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," for the purpose of obtaining a firearm.
2. On or about October 22, 2014 defendant BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," traveled with OLAJUWON DAVIS, a/k/a "Ali," a/k/a "Brother Ali," a/k/a "Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali," and another person to Cabela's Retail – Hazelwood, Missouri wherein BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," purchased a Smith & Wesson, Model SD9VE 9mm Pistol bearing serial number HFT6619 on behalf of another person.
3. On or about October 22, 2014, defendant BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother Brandon," after obtaining said firearm, illegally transferred said firearm to another person who had previously been convicted of a felony crime.
4. In or about October 2014, defendant OLAJUWON DAVIS, a/k/a "Ali," a/k/a "Brother Ali," a/k/a "Olajuwon Akeem Ozreal Raheem Lamar Xavier Ali," introduced another person to BRANDON ORLANDO BALDWIN, a/k/a "Brandon Muhammad," a/k/a "Brother



Brandon,” for the purpose of obtaining a firearm.

5. On or about November 7, 2014, defendant BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” traveled with two persons to Cabela’s Retail – Hazelwood, Missouri wherein BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” purchased a Hi-Point Firearm, Haskell Mfg. Inc., Model JHP .45ACP Pistol bearing serial number X4263774; and a Hi-Point Firearm, Haskell Mfg. Inc., Model JHP .45ACP Pistol bearing serial number X4263775 on behalf of another person or persons.

6. On or about November 7, 2014, defendant BRANDON ORLANDO BALDWIN, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon,” after obtaining said firearms, illegally transferred said firearms to another person who had previously been convicted of a felony crime.

All in violation of Title 18, United States Code, Section 371.

### **COUNT III**

The Grand Jury further charges that:

Beginning at a time unknown, but including on or about October 22, 2014, and continuing thereafter to on or about November 13, 2014, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri,

**OLAJUWON DAVIS,**  
a/k/a “Ali,”  
a/k/a “Brother Ali,”  
a/k/a “Olajuwon Akeem Ozreal Raheem  
Lamar Xavier Ali,” and  
**BRANDON ORLANDO BALDWIN,**  
a/k/a “Brandon Muhammad,”  
a/k/a “Brother Brandon,”

the defendants herein, aided and abetted each other, in connection with the acquisition of a firearm,

to wit: a Smith & Wesson, Model SD9VE 9mm Pistol bearing serial number HFT6619, from Cabela's Retail – Hazelwood, Missouri, a licensed dealer, to knowingly make a false and fictitious written statement to said dealer, which statement was intended and likely to deceive said licensed dealer with respect to a fact material to the lawfulness of the sale of said firearm under Chapter 44 of Title 18, of the United States Code, in that Brandon Orlando Baldwin, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” represented that he was the actual buyer of said firearm when in fact Brandon Orlando Baldwin, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” was acquiring said firearm on behalf of another person.

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

**COUNT IV**

The Grand Jury further charges:

Beginning at a time unknown, but including on or about October 11, 2014, and continuing thereafter to on or about November 13, 2014, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri,

**OLAJUWON DAVIS,**  
a/k/a “Ali,”  
a/k/a “Brother Ali,”  
a/k/a “Olajuwon Akeem Ozreal Raheem  
Lamar Xavier Ali, and  
**BRANDON ORLANDO BALDWIN,**  
a/k/a “Brandon Muhammad,”  
a/k/a “Brother Brandon,”

the defendants herein, aided and abetted each other, in connection with the acquisition of firearms, to wit:

(a) A Hi-Point Firearm, Haskell Mfg. Inc., Model JHP .45ACP Pistol bearing serial number X4263774; and



(b) A Hi-Point Firearm, Haskell Mfg. Inc., Model JHP .45ACP Pistol bearing serial number X4263775

from Cabela's Retail – Hazelwood, Missouri, a licensed dealer, to knowingly make a false and fictitious written statement to said dealer, which statement was intended and likely to deceive said licensed dealer with respect to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, of the United States Code, in that Brandon Orlando Baldwin, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” represented that he was the actual buyer of said firearms when in fact Brandon Orlando Baldwin, a/k/a “Brandon Muhammad,” a/k/a “Brother Brandon” was acquiring said firearms on behalf of another person or persons.

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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